

EXHIBIT “B”

From: [Michael Mule](#)
To: [Gibbs, J. Evan](#); [Gorman, Daniel E.](#); [Mulry, Kevin P.](#); [Kent, Paris L.](#); [Adler, Matt](#)
Cc: [Michael Mule](#); [Colleen O'Neil](#); [Nicole Koster](#); [Ken Novikoff \(Ken.Novikoff@rivkin.com\)](#); [Robert Milman](#)
Subject: Siteone Landscape Supply, LLC v. Giordano et al. / 2:23-cv-02084-GRB-SIL; Discovery Deficiencies
Date: Monday, July 15, 2024 12:57:34 PM

Evan,

As you know, we represent Don Caroleo, The Garden Dept. Corp, 3670 Route 112 LLC and 9 4th St. LLC (the "Don Defendants"). We write in follow up to the meet & confer on Friday.

On behalf of the Don Defendants, we sent a detailed 15-page letter on June 28, 2024, identifying the deficiencies in discovery responses by Plaintiff SiteOne Landscape Supply, LLC ("SiteOne"). In response to our request for meet & confer dates, you proposed "schedul[ing] a meeting" with respect to SiteOne's deficiencies once the meet & confers as to SiteOne's claims of the Defendants' alleged deficiencies have been completed. We are fine with that process. In fact, we have been patiently going through SiteOne's claims of deficiencies in several meet & confer sessions over the last three weeks: June 24, 2024; June 28, 2024; July 11, 2024; and July 12, 2024.

Please advise as to your availability this week: (i) to complete meet & confer as to your claims of deficiencies in defendants' discovery responses, and (ii) to schedule meet & confer dates to go over deficiencies in SiteOne's responses to our discovery demands. We are, generally, available and will block out several hours at a time if necessary.

Finally, it is our position that we should schedule a simultaneous exchange of supplemental responses once meet & confers on all discovery responses have been completed. In this regard, we note that since our June 28, 2024 letter was very detailed, it would truncate the time necessary for the additional meet & confer sessions and would crystallize the issues if SiteOne responded to that letter.

We thank you for your attention to this matter.

Very truly yours,

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